

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND, et al.,

Plaintiffs,

v.

C.A. No.:

DONALD J. TRUMP, et al.,

Defendants.

DECLARATION OF TREVOR KAINOA DAINES

Pursuant to 28 U.S.C. § 1746, I, Trevor Kainoa Daines, hereby declare as follows:

1. I am a resident of Hawaii. I am over the age of 18 and have personal knowledge of all the facts stated herein, except as to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.
2. On August 15, 2024, I was appointed as President for Friends of the Judiciary History Center of Hawaii (hereinafter, “Friends”).
3. The purpose of the Friends is to support the King Kamehameha V Judiciary History Center (hereafter “JHC”) as a permanent educational institution for research, collection, preservation and presentation of information and objects relating to the judicial and legal history of Hawai‘i, and to serve the public interest.
4. As President, I am responsible for overseeing all aspects of fundraising to support JHC, including grant applications.
5. I submit this declaration in connection with Executive Order 14,238, “Continuing the Reduction of the Federal Bureaucracy,” which directs seven federal agencies, including the Institute for Museum and Library Services (“IMLS”), to eliminate any non-statutory components and functions to the maximum extent consistent with applicable law, and to reduce the performance of any statutory functions and associate personnel to the minimum presence and function required by law.
6. Given my experience, I believe that Executive Order 14,238, and the actions taken to reduce the agency will gut IMLS and cause it to be unable to administer financial awards and/or

programs on which Hawaii relies and on which it expects to rely in the future, causing significant harm to the Hawaii, the Friends of the Judiciary History Center, and JHC.

The Museum and Library Services Act

7. In 1996, Congress enacted the Museum and Library Services Act, 20 U.S.C. § 9101 *et seq.*, which is a federal funding statute that provides funding to help support museums across the United States. IMLS, which administers the Museum and Library Services Act, is authorized to provide federal funding to museums in the form of grants, cooperative agreements, and other forms of assistance. 20 U.S.C. § 9173(a). IMLS is also authorized to provide federal funding to state governments to administer to museums. *Id.*

8. A “museum” is a public, tribal, or private nonprofit agency or institution organized on a permanent basis for essentially educational, cultural heritage, or aesthetic purposes, that utilizes a professional staff, own or utilizes tangible objects, cares for tangible objects, and exhibits the tangible objects to the public on a regular basis.” 20 U.S.C. § 9172(1).

9. Section 9173(a) provides that IMLS may enter into agreements to pay the federal share of the cost of:

- (1) supporting museums in providing learning and access to collections, information, and educational resources in a variety of formats (including exhibitions, programs, publications, and websites) for individuals of all ages;
- (2) supporting museums in providing learning partnerships with the Nation’s schools, including tribal schools, and developing museum resources, capabilities, and programs in support of State and local efforts to offer a well-rounded educational experience to all students; and
- (3) supporting the conservation and preservation of museum collections, including efforts to: provide optimal conditions for storage, exhibition, and use; prepare for and respond to disasters and emergency situations; establish endowments for conservation; curate, stabilize, and organize object-related information; and train museum staff in collections care.

10. In the past, the Friends has received the following sources of funding from IMLS:

- a. In 2024, the Friends received \$250,000 from IMLS through a IMLS's Native American/Native Hawaiian Museums Services Program.
- b. The grant funds initial design planning for the complete redesign and renovation of JHC's permanent museum exhibits and visitor experience. (The existing exhibits and visitor flow are based on 1980s research, analysis, and technology). Upon receipt of funding, the Friends and JHC conducted a week-long site meeting with exhibit design firm, Solid Light, Inc., an award-winning exhibit design firm based in Louisville, Kentucky. The site visit culminated with a day-long meeting of JHC's stakeholders (Educators, historians, Native Hawaiian community members, museum professionals, and Judiciary personnel) to finalize interpretive themes and content. Following the site visit, Solid Light, Inc. has provided monthly increments of design progress. To date, approximately \$58,000 of the grant remains for completion of the project.
- c. Last November 2024, the Friends submitted an application and anticipate a renewal of this project for an additional \$250,000 – again through IMLS's Native American/Native Hawaiian Museums Services Program. With this additional \$250,000 award, the entire design planning stage for the Friends redesign of JHC will be completed by June 2026. Federal support and funding for the Friends' planning project allows JHC to not only create a new educational and orientation space for the public within the State of Hawai'i's Supreme Court building, but also new community partnerships,

public programming, research publications and curriculum, and intern and volunteer support with the Judiciary's historic collections.

11. This year, the Friends budget for JHC's renovation has relied on a grant of \$75,000 from the National Endowment for the Humanities, and \$250,000 from IMLS. The Friends' Board of Directors are comprised primarily of young working professionals who serve the board on a volunteer basis. The majority of fund raising is achieved through grant writing. Approximately \$105,000 has been raised through direct fundraising to individuals.

12. Following the completion of the exhibit design phase, the Friends intend to for further funding from IMLS for exhibit construction.

13. Any suspension in our federal funding would bring JHC's exhibit renovation plans to a halt. Nor would the Friends be able to compensate Solid Light, Inc. for work already completed. This project has already unearthed formerly unknown historical materials resulting in an abundance new contemporary scholarship. This information will remain unknown to the public if IMLS funding is terminated.

14. The Friends has an excellent track record of meeting state and federal grant benchmarks including timelines, grant reporting, and payment to vendors. In 2024, the Friends was one of three Hawaii organizations awarded IMLS' Native American/Native Hawaiian Museums Services Program. We have received very positive feedback regarding our most recent application for an additional \$250,000 under the same program.

15. On June 30, 2025, we are scheduled to receive reimbursements of \$58,000 under our current Federal awards. This is the remaining amount of unspent funds from the \$250,000 award.

16. If we do not receive such disbursements/reimbursements, it will negatively impact the vendors working on the redesign. Our scholarship and community partnerships already accomplished through this project will face setbacks if funding is terminated.

17. On February 11, 2025, the Friends were notified that an Executive Order issued by President Trump was terminating a Department of Education “Seeking Effective Education Development” (SEED) grant of which the Friends was a sub awardee. Fortunately, on April 11, the grant was restored following a March 10, 2025, Temporary Restraining Order issued by the U.S. District Court for the District of Massachusetts in *California v. Department of Education*. The temporary pause of that grant’s funding had a chilling effect on JHC’s teacher development plans. A teacher workshop was canceled. Mentor teachers working with 28 teachers participating in the grant were instructed to stop their mentoring. The pause resulted in the delay of teacher development and we are scrambling to fulfill the grant’s objectives by the end of the school year. This also causes significant hardship for the middle school teachers.

18. The Hawai‘i State Judiciary provides JHC’s annual operating budget, which averages \$300,000 per year. The majority of JHC’s annual budget covers staff salaries, with about 5-10% available for office equipment, supplies, and subscriptions. JHC relies entirely on external funding sources raised by the Friends to carry out many of its core services, such as civic education and K-12 curriculum development, teacher professional development workshops, research and exhibition development, preservation, digitization, and public access to its historic collections and archives, student internship opportunities, and public programming partnerships. The museum serves as a vital community resource for local residents and an informative hub for tourists, and many more critical activities with far-reaching local and national impacts.

19. If IMLS is terminated, our current redesign of the JHC will cease. Vendors will not be paid for services they have already provided. Partnerships associated with this project will suffer needlessly. New scholarship regarding the civic and public policy history in Hawaii will remain untold. These setbacks will significantly undermine our important mission.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on March 25, 2025, at Honolulu, Hawai‘i.

A handwritten signature in black ink, appearing to read "Trevor Kainoa Daines". The signature is fluid and cursive, with a large oval shape on the right side.

Trevor Kainoa Daines, President
Friends of the Judiciary History Center of Hawai‘i